

# EXHIBIT 75

**FILED**  
San Francisco County Superior Court

JAN 16 2018

CLERK OF THE COURT

BY: *Jana Gonzales*  
Deputy Clerk

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SAN FRANCISCO**

UBER TECHNOLOGIES, INC.,

*Petitioner/Plaintiff,*

v.

GOOGLE, INC.,

*Respondent/Defendant,*

ANTHONY LEVANDOWSKI; LIOR RON,

*Real Parties in Interest.*

Case No. CPF-17-515960

**[PROPOSED] ORDER GRANTING  
UBER'S PETITION TO VACATE  
ARBITRATION DISCOVERY ORDER**

Petition Filed: November 30, 2017

1 On November 30, 2017, Plaintiff/Petitioner Uber Technologies, Inc. (“Uber”) filed a  
 2 Petition to Vacate Arbitration Discovery Order and Memorandum and Points and Authorities in  
 3 Support Thereof. Google, LLC (“Google”)<sup>1</sup> answered and opposed Uber’s Petition on December  
 4 14, 2017. Uber filed a reply on December 21, 2017.

5 The Court held an *in camera* hearing on January 11, 2018. The Court has jurisdiction to  
 6 hear this petition pursuant to *Berglund v. Arthroscopic & Laser Surgery Center of San Diego, L.P.*  
 7 (2008) 44 Cal. 4th 528.

8 Having considered the Parties’ filings and oral argument and the materials cited therein,  
 9 and having reviewed the materials at issue *in camera*, the Court rules as follows:

10 1. The Court VACATES the November 15, 2017, decision of the arbitration panel in  
 11 *Google, Inc. v. Levandowski and Ron*, JAMS Ref. No. 1100086069 (the “Arbitration”), as well the  
 12 October 24, 2017, order by Justice Panelli that it summarily affirmed and adopted (together, the  
 13 “Arbitration Order”), and which compelled Uber to produce the following “Stroz-related  
 14 materials”: “(1) the final Stroz Report and all exhibits thereto; (2) any draft or intermediate  
 15 versions of the Stroz Report, including any interim summaries, findings, or analyses by Stroz; and  
 16 (3) all interview memoranda or summaries related to the ‘diligenced’ former Google employees”  
 17 (collectively, the “Stroz Materials”).

18 2. The Court holds that the Stroz Materials are protected under the California law of  
 19 attorney-client privilege, and this privilege was not waived or lost by the sharing of these materials  
 20 by and among Uber, Otto, Anthony Levandowski, Lior Ron, and the respective counsel of those  
 21 parties because those parties shared a common interest in evaluating and preparing for potential  
 22 litigation that might be brought against them by Google. *See* Cal. Evid. Code §§ 912, 952, 954.

23 Accordingly, the Arbitration Order is VACATED as contrary to California law.  
 24 IT IS SO ORDERED.

25  
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 27 <sup>1</sup> On September 30, 2017, Google, Inc. changed its name and corporate format, becoming a limited  
 28 liability company named Google LLC, the proper name for Respondent to this Petition.

Dated: January 16, 2018



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HONORABLE HAROLD E. KAHN  
JUDGE OF THE SUPERIOR COURT

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